

MAY 21 2013

UNITED STATES DISTRICT COURT

for the

SOUTHERN DISTRICT OF TEXAS

United States of America

v.

ALANIZ, Alberto

Year of birth: (1963), usc

See Attachment A

Defendant(s)

Case No. M-13-0922-M

David J. Bradley, Clerk

UN SEALED

5/23/13

SEALED CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6/16/2011 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

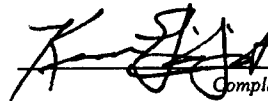
Offense Description

841 (a) (1) and 846

Conspiracy to Possess with Intent to
Distribute Marijuana, more than a
thousand kilograms, a schedule I
controlled substance.

This criminal complaint is based on these facts:

(See Attachment I).

☒ Continued on the attached sheet.

Complainant's signature

Kade Lindquist, Special Agent DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/22/2013 2:39 PMCity and state: McAllen, Texas

Judge's signature

Peter E. Ormsby

US Magistrate Judge

Printed name and title

ATTACHMENT A

2. ROMO, Jose Ramon; (1984), USC
3. PEREZ, Candelario Jr.; (1971), USC
4. SALINAS-Rivera, Juan Moises; (1985), USC
5. ALANIZ, Michael Stephen; (1982), USC

Attachment "I"

In March 2011, agents met with a cooperating defendant (CD 1) who stated that Alberto Alaniz (A. ALANIZ) and Jose Ramon Romo (ROMO) were the leaders of a drug trafficking organization which transports drugs from the McAllen, Texas area to various destinations, including Houston, TX, Atlanta, GA, Louisville, KY and Memphis, TN. According to CD 1, A. ALANIZ and ROMO coordinated the transportation of thousands of pounds of marijuana on multiple occasions. Agents are aware that A. ALANIZ owns a brokerage business, Faith Brokerage, which he and ROMO use to facilitate the transportation of marijuana.

In June 2011, Texas Department of Public Safety Investigators (DPS) received information about suspicious activity at a warehouse in McAllen, TX. On June 16, 2011, DPS investigators conducted a traffic stop on a semi-tractor trailer driven by Dennis Chambers after observing it leave the warehouse. A search located 1,799 kilograms of marijuana hidden in the trailer. DPS investigators returned to the warehouse and arrested five (5) individuals. Subsequently, several of the individuals arrested at the warehouse identified Juan Moises Salinas-Rivera (SALINAS) as the individual who hired them to conceal the marijuana in the semi-tractor trailer. Additionally, the warehouse owner provided DPS investigators with a copy of the check used to rent the warehouse, which was signed by ROMO.

On July 5, 2011, agents interview ROMO who admitted that from 2005 to the date of the interview, he and A. ALANIZ coordinated the transportation of thousands of pounds of marijuana for several sources of supply, including Candelario Perez Jr. (PEREZ). ROMO stated that the marijuana seized on June 16, 2011 by DPS belonged to PEREZ, and that he and A. ALANIZ were coordinating the transportation of the marijuana to Houston, TX on behalf of PEREZ. ROMO stated that SALINAS assisted A. ALANIZ and ROMO by handling the preparation of the marijuana prior to it being secreted in the trailer, as well as hiring the individuals to load the marijuana into the trailer.

Later in July 2011, agents recorded a telephone call in which PEREZ arranged for a large amount of marijuana to be delivered to ROMO so that the marijuana could be transported to Dallas, TX. On July 18, 2011, agents seized the marijuana which totaled approximately 924 kilograms.

On January 23, 2012, Edinburg, TX Police Department Officers (EPD) arrested Michael Stephen Alaniz (M. ALANIZ), who is the son of A. ALANIZ, after he was found to be in possession of approximately 68 kilograms of marijuana. Several days later, agents interviewed A. ALANIZ who admitted that he, ROMO, and M. ALANIZ had previously taken possession of approximately 900 kilograms (2,000 pounds) from a source of supply. According to A. ALANIZ, they were supposed to transport the marijuana for the source of supply, however, they decided to steal the marijuana instead. A. ALANIZ stated that once M. ALANIZ had taken possession of the marijuana, he utilized _____ to provide false information to the source of supply indicating that the marijuana had been seized by authorities. According to A. ALANIZ, _____ claimed to be a federal law enforcement officer who could cover up the theft by providing false information to the source of supply indicating the marijuana had been seized by law enforcement. A. ALANIZ informed agents that

he, M. ALANIZ and ROMO had sold approximately 950 pounds of the marijuana to another individual. Additionally, A. ALANIZ confirmed that the remainder of the marijuana was still at a residence located at 219 E. Vine St., McAllen, TX. Agents subsequently seized approximately 449 kilograms of marijuana from the residence.

Several days later, agents interviewed M. ALANIZ who admitted that he, A. ALANIZ and ROMO had agreed to steal the marijuana from the source of supply. M. ALANIZ also stated that he paid [redacted] who claimed to be a federal law enforcement officer, thousands of dollars to provide false information to the source of the marijuana indicating that the marijuana had been seized in an effort to cover up the theft so that they could further distribute the marijuana for a profit.